


NPDES Roundtable Meeting Agenda
Skype Meeting, Hosted by
Santa Ana Regional Water Quality Control Board

July 19, 2018, 9:00 – 12:00pm





To join the online meeting:
See appointment for Skype link

To join the teleconference only:
+1 (916) 562-0861, access code: 41806911

ITEM	1	Assigned to:	Time
Title of Topic	INTRODUCTIONS/REVIEW AGENDA AND ACTION ITEMS	Milasol Gaslan	9:00- 9:15 (15 mins)
Purpose	Roll call and review agenda. Region 1: Cathy Goodwin Region 2: Mary Boyd, Robert Schlipf, Bill Johnson Region 3: Philip Hammer, Harvey Packard Region 4: Jau Ren Chen Region 5: Jim Marshall Region 6: Not Present Region 7: Kai Dunn Region 8: Milasol Gaslan, Jayne Joy Region 9: Brandi Outwin- Beals State Board: Afrooz Farsimadan, Gil Vazquez, Renan Jauregui, Christine Rico, Salvador Chaparro EPA: Becky Mitschele, Lauren Fondahl, Jamie Marincola, Sandra Chew PG Environmental: Dan Connally OE: Erin Mustain		
Desired Outcome	Get attendance and finalize agenda.		
Background			
Attachments/ Links:	 NPDES.RT. April 19 2018_Final Mtg Min		
Contact Person	Milasol Gaslan (951-782-4419), milasol.gaslan@waterboards.ca.gov		
Action Items			

ITEM	2	Assigned to:	Time
Title of Topic	EPA UPDATES	EPA Staff	9:15-9:35 (20 minutes)

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Purpose	<p>1) Provide updates regarding EPA's NPDES programmatic criteria;</p> <p>2) Biosolids and example permit language (RB7 City of Calexico WPCP NPDES Permit example); and</p> <p>3) Coding permits into ICIS and the recent PG Environmental Training</p>
Desired Outcome	Information Sharing and Solicitation of Feedback
Background	<p>1) Provide updates regarding EPA's NPDES programmatic criteria: EPA R9 has discussed this effort to develop programmatic criteria for each program that receives funding from EPA in past roundtables and during a listening session. We shared the draft final criteria during the last (April) Roundtable (attached again for ease of reference). The purpose of the criteria is to assess relative performance across states and programs as well as making EPA's expectations as transparent as possible. This effort complements already existing program evaluations.</p> <p>EPA R9 met with SB management to discuss using the NPDES program as a pilot for this effort. Therefore, we are likely to start assessing programs using the criteria within the next six months. We will be coordinating with the RBs, as we start this assessment. EPA will fill out the criteria matrix and will provide the RBs an opportunity to review.</p> <p>2) Biosolids and Example Permit Language (RB7 City of Calexico WPCP NPDES Permit): Permit language, in the special conditions, could address biosolids compliance issues for POTWs. For example, the City of Calexico has biosolids management issues, including long-term stockpiles onsite at the POTW. Suggested permit language was provided to the RB. To review, biosolids annual reports, go to ICIS/ECHO.</p> <p>3) Coding permits into ICIS and the recent PG Environmental Training: PG Environmental hosted a webinar for how to code permits into EPA's ICIS database. All Regional Boards attended. However, no evaluation forms were provided. Therefore, we would like to discuss the training format and content.</p> <p>(Please note that PG Environmental also conducted inspection training webinars (CEI) on June 21 and June 26, 2018).</p>
Attachments/ Links:	<p>Attachment for item 1: final NPDES programmatic criteria matrix and guidelines (redistributed from April 2018 NPDES Roundtable)</p> <p>Attachment for item 2: biosolids table</p> <p>Attachment for item 3: training course evaluation for introduction to ICIS coding.</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;">  Final Criteria GUIDELINES_NPDES Revised_CaliforniaC </div> <div style="text-align: center;">  NPDES Table </div> <div style="text-align: center;">  Biosolids Table 2018.docx </div> <div style="text-align: center;">  Training Evaluation_Introduc </div> </div>
Contact Person	Becky Mitschele, USEPA at 415-972-3492
Notes – Item 2	<p>EPA's NPDES Programmatic Criteria Update</p> <p>The NPDES program has been selected as a pilot for developing programmatic criteria. In the April NPDES Roundtable, Becky sent out the criteria matrix. There was confusion regarding who should fill out the matrix. EPA R9 will start assessing programs using the criteria within the next six months. EPA will coordinate with the SB and RBs, as they start this assessment. EPA will fill out the criteria matrix and will provide the RBs the draft report for review by October 2018 before finalizing it.</p>

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	<p>Permit coding: EPA's ICIS Coding training was provided to all RB staff. The goal is to get Regional Board staff to code their own permits in anticipation of the termination of in-kind contractor support by 2020. EPA didn't get any feedback from the training attendees. RBs are concerned about workload. Staff are getting behind on permit inspections and follow ups. Coding ICIS is complicated and time consuming and RBs don't have the resources to code their own permits. RBs suggested to create a centralized group to code permits statewide.</p>
Decisions	Provide an update to MCC/DMC and request management decision on how to proceed with ICIS coding once the in-kind contractor support has ended.
Action Items	State Board will provide a summary outlining the ICIS coding process and send it to Jayne Joy and RB program managers. Jayne will present the issue in the next MCC meeting in September.

ITEM	3	Assigned to:	Time
Title of Topic	BIOSOLIDS LANGUAGE IN NPDES PERMITS	Lauren Fondahl, USEPA	9:35-10:05 (30 minutes)
Purpose	Outline when biosolids language should be included in NPDES permits issued to POTWs		
Desired Outcome	Inclusion of biosolids language in permits where needed to address on-site conditions, clarify monitoring and reporting requirements required under 503, General Order, and individual land application WDRs		
Background	While EPA's 503 rule is self-implementing, some provisions in it need to be spelled out further for some POTWs so that they meet requirements under 503, the State General Order for biosolids, and individual WDRs. In addition, some needed O & M requirements not specifically addressed under 503 should be included in the NPDES permit.		
Attachments/ Links:			
Contact Person	Lauren Fondahl (EPA Region 9)		
Notes – Item 3	EPA is requesting that a language be included in the NPDES permit template to require POTWs to report their stockpile volumes into EPA's database. Lauren provided a background and a RB7 specific permit example. RBs have general concern about liability since the Water Boards don't have authority to regulate biosolids.		
Decisions	Consult with the Office of Chief Counsel regarding the inclusion of the language in the NPDES permits.		
Action Items	Lauren will send the suggested language to Afrooz to distribute to Regional Board program managers for review and comments before sending it to the Office of Chief Counsel for review.		

ITEM	4	Assigned to:	Time
Title of Topic	CYANIDE DISCUSSION: CONTINUED FROM APRIL NPDES ROUNDTABLE	All	10:05 – 10:20 (15 minutes)

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Purpose	Continue discussion to resolve handling elevated cyanide effluent results from POTWs
Desired Outcome	Discuss an approach to resolve what appears to be a common issue to many Regional Boards.
Background	<p>At the April 2018 NPDES roundtable, R1 asked R7 for a brief update on cyanide issue they previously dealt with. R7 facility conducted a study to determine if it was a source issue or lab issue and verified it was not a source issue and concluded that it was probably a lab issue. Better lab procedures/protocol implemented appeared to work for the larger facilities although still an issue for smaller facilities.</p> <p>R4's LA County Sanitation District obtained ELAP certification for an alternative CN analytical method that didn't require sample preservation. They found that sample preservative may be causing cyanide generation. Alternative method requires analysis to be conducted within a short time. City of Thousand Oaks is doing studies regarding cyanide to determine: if chlorination maybe generating it, if it may be related to contact time, and where in the process cyanide might be generated. R5 Stockton facility doing analysis of unpreserved sample within 15 minutes; study of preserved and unpreserved sample will provide evidence that it is false positive, R2 stated cyanide was found to be a by-product of chlorination. R7 suggested perhaps State Board can take this up and set up a workgroup. Defer to next NPDES RT.</p>
Attachments/ Links:	
Contact Person	
Notes – Item 4	<p>Topic originally brought up by RB1 in April RT meeting. Coming up with an approach to handle cyanide limits and monitoring requirement in respect to reporting approach, and long-term monitoring solution. Identify sources. Update on studies, next quarter meeting.</p> <p>RB7 has a limit based on free cyanide – RB9's Limit is based on total cyanide RB2 set the limit based on total cyanide and included a footnote that weak acid dissolution method can be used. The result showed reasonable potential. The discharger asked for a time schedule to try an alternative method. RB granted the time schedule order allowing monitoring using a different method. It will be helpful to have data on total CN or free or acid dissolved to see the difference.</p>
Decisions	Keep as a standing item - all RBs identify approaches and solutions to share and see how results are comparing. Discuss in the next RT meeting.
Action Items	<p>Jayne Joy – Will reach out to CASA to see if the study was done and if they can share the results. Ask for data on the types of CN.</p> <p>Milasol Gaslan – Will look into SAP study and share the results.</p> <p>Katy will share the result of RB1 and RB4 monitoring in the next RT meeting.</p>

BREAK
10:20 – 10:30 AM

ITEM	5	Assigned to:	Time
Title of Topic:	PRETREATMENT BCP UPDATE	Afrooz Farsimadan State Board	10:30 -10:50 (20 minutes)
Purpose:			

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Desired Outcome:	Information Sharing
Background:	The State Water Board Division of Water Quality is coordinating with the Division of Drinking Water to Develop a Budget Change Proposal (BCP) to request positions for the Pretreatment Program in preparation for the loss of in-kind contractor services. If the BCP is approved, the proposed positions will be placed in a unit within the Division of Water Quality and located either in the California EPA building at the State Water Board or in Regional Board offices.
Attachments/ Links:	
Contact Person:	Afroz Farsimadan - 916-341-5544
Notes – Item 5	This resource request is for FY 19/20. The BCP has been developed to address the loss of in-kind contract services for pretreatment audits and inspections and the Division of Drinking Water need to address enhanced pretreatment for direct and indirect potable re-use. The State Board is Requesting eight positions; one senior WRCE and seven WRCEs. If approved, the positions will be housed under a unit in DWQ and will start hiring in July 2019.
Decisions:	None
Action Items:	None

ITEM	6	Assigned to:	Time
Title of Topic:	ADMINISTRATIVE PROCEDURES MANUAL (APM) UPDATE	Afroz Farsimadan State Board	10:50 - 11:10 (20 minutes)
Purpose:	Coordinate with Regional Boards on updating the NPDES Wastewater Program APM		
Desired Outcome:	Update the NPDES APM and the Intranet site by August 2019		
Background:	The State Water Board Executive Director is expecting all programs have an updated APM, and intranet site. The SB NPDES unit has prepared an APM workplan with a tentative schedule for the update.		
Attachments/ Links:	 NPDES WW APM Update Workplan.d		
Contact Person:	Afroz Farsimadan – 916-341-5544		
Notes – Item 6	The State Water Board Executive Director has asked all programs to have an updated APM. The NPDES has an existing, well organized APM on the Intranet site. We are planning to revisit the existing APM, and update it if necessary. A workplan has been prepared to start the process. By the end of August, the SB will send the existing APM to all NPDES program managers and request their comments/edits.		
Decisions:	Keep the item on the RT agenda until finalized		
Action Items:	Afroz will send the existing APM to the RBs by the end of August. RB to make changes to the APM and return to Afroz by February 2019.		

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ITEM	7	Assigned to:	Time
Title of Topic:	NPDES WATERNET UPDATES	Gil Vazquez State Board	11:10 – 11:25 (15 minutes)
Purpose:	Information Exchange		
Desired Outcome:	Information Exchanged		
Background:	The NPDES Waternet webpage contains information/reference material to assist staff with permits, inspections and data entry. Gil Vazquez will present the NPDES Waternet webpage along with recent updates.		
Attachments/ Links:	NPDES Waternet webpage link: http://waternet/dwq/npdes/ SSO Waternet webpage link: http://waternet/dwq/ss/docs/index.php		
Contact Person:	Gil Vazquez – 916-322-1400		
Notes – Item 7	<p>Gil presented the NPDES Waternet webpage Program Tools and the General Permits sections. Gil showed the recently added training material for Compliance Evaluation Inspection and Integrated Compliance Information System Coding training webinar provided by PG Environmental. Gil also presented the Sanitary Sewer Overflow Waternet webpage. This page includes copies of the current order, data files, performance reports, and the newly added training material. Currently the training material consists of a video produced by Jim Fischer (Office of Enforcement) on how to review collection system Capital Improvement Plans.</p> <p>The Reasonable Potential Calculation spreadsheet is available on the (http://waternet/dwq/npdes/permit/).</p> <p>RBs requested a link to all USEPA training be included on NPDES Waternet webpage with a focus on CA specific training material. Gil will work with Becky Mitschele (USEPA) and Brandi Outwin-Beals (RB9) to provide the links.</p> <p>Contact Gil Vazquez for additional suggestions or recommendation for the Waternet webpage.</p>		
Decisions:			
Action Items:	<p>Becky- Will create a link to EPA website.</p> <p>Gil – will add USEPA links to NPDES Waternet webpage.</p>		

ITEM	8	Assigned to:	Time
Title of Topic	WASTEWATER FROM INDOOR CANNABIS GROWERS	Celia Pazos and Pamela Ybarra Region 8	11:25-11:55 (30 minutes)
Purpose	Information sharing. Poll other Regional Boards on POTW's reaction to sewer connection of indoor cannabis growers within their jurisdiction.		
Desired Outcome	Shared Region 8 experience and hear other Regions'.		

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Background	<p>In October 2017, the State Water Board adopted the Cannabis Cultivation Policy and General Order. The General Order establishes a Waiver of WDRs applicable to most indoor commercial cultivation activities, provided that the cultivators use municipal source water and discharge all wastewater to a community sewer system.</p> <p>The South Coast Cannabis Cultivation Regulatory Unit is in the Region 8 office and is responsible for cannabis cultivation compliance and enforcement activities across three of the most heavily urbanized Regions in California (4/8/9), where both permitted and illicit indoor cannabis cultivation is common.</p> <p>Elevated salt and nutrient concentrations in wastewater discharges from indoor cannabis growers are posing concerns to some sewer agencies, particularly where WWTPs are approaching effluent discharge limits. Staff will share pictures and information on indoor cultivation activities and concerns raised by POTWs regarding wastewater from indoor grows.</p>
Attachments/ Links:	
Contact Person	Eric Lindberg – 951-782-3219
Notes – Item 8	Celia Pazos and Pamela Ybarra gave an overview of the SB policy regarding Cannabis cultivations. Specifically, indoor cultivation using hydroponic which is exempt from the General Order. Wastewater from cultivation is considered industrial waste. Effluent from indoor cultivation has high TDS concentration ranging from 1250 mg/L to 4000 mg/L. POTWs may not be able to accept the discharge levels. Question came up regarding the use and regulation of pesticides.
Decisions	
Action Items	Office of Enforcement staff provided staff in DWQ's Cannabis Unit information about the use of pesticides.

ITEM	9 Added	Assigned to:	Time
Title of Topic:	NPDES WATERNET UPDATES	Erin Mustain Office of Enforcement	(15 minutes)
Purpose:	Information Exchange		
Desired Outcome:			
Background:			
Attachments/ Links:			
Contact Person:	Erin Mustain – 916-445-9379		
Notes – Item 9	<p>USEPA has enforcement priority of reducing the number of facilities with significant non-compliance (SNC). Gil sends quarterly SNC reports to the RBs for resolution of data issues not transferred to the federal database.</p> <p>Some permits get rescinded and the Order doesn't get to the contractor. Additionally, ROWDs aren't always sent and so permits aren't getting administratively continued and expired permits are not on the QNCR.</p>		

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	<p>The Office of Enforcement is looking at enforcement orders, Time Schedule Orders and Cease and Desist Orders. EPA considers these types of Orders formal enforcement.</p> <p>Erin is currently working to validate all of the facilities on the SNC and will work with permitting staff to help facilities to come back to compliance. This quarter 127 facilities were on the list which were reduced to 98 by data resolution.</p>		
Decisions:			
Action Items:	Erin will reach out to the Regional Boards by the end of September		
ITEM	10	Assigned to:	Time
Title of Topic	WRAP UP	Milasol Gaslan	11:55-12:00 (5 mins)
Purpose	Conclude meeting		
Desired Outcome	Summarize action items from this meeting, potential agenda items for future meetings, and confirm future meeting date.		
Background	Next quarterly meeting will be tentatively set with SB hosting, decide if teleconference or face to face, note taker is R1.		
Attachments/ Links:			
Contact Person	Milasol Gaslan (951-782-4419)		
Notes			
Decisions	Next meeting will be on October 18, 2018. SB hosting. R1 note taker.		
Action Items	Send out request for agenda items early to determine face-to-face or teleconference.		